

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Bruce K. Redding, Jr.

Chapter 11

Debtor.

**AMENDED DECLARATION OF THOMAS D. BIELLI, ESQUIRE IN SUPPORT OF
APPLICATION FOR AUTHORITY TO EMPLOY AND RETAIN
BIELLI & KLAUDER, LLC AS COUNSEL TO THE DEBTOR**

I, Thomas D. Bielli, of full age, being duly sworn according to law, hereby declare as follows:

1. I am an attorney and counselor at law, admitted to practice in the Commonwealth of Pennsylvania and in this Court.
2. I am a Partner with the law firm of Bielli & Klauder, LLC (“BK”), 1905 Spruce Street, Philadelphia, PA 19103.
3. On May 20, 2021 the Debtor filed an Application for Authority to Employ and Retain Bielli & Klauder, LLC as Counsel to the Debtor (D.I. 7) (the “Application”). The Application contained the Declaration of Thomas D. Bielli, Esquire (the “Declaration”) in support of the Application.
4. Paragraph 34 of the Declaration contains the sentence “Additionally, BK requested and the Debtor agreed to provide a post-petition retainer of \$10,000.00 to BK on or before June 16, 2021.”
5. On June 16, 2021 the Office of the US Trustee (the “US Trustee”) filed the US Trustee’s Response to Debtor’s Application to Employ Bielli & Klauder, LLC as Counsel Under Section 327(a) of the Bankruptcy Code (D.I. 16) (the “UST’s Objection”). The UST objected to the post petition retainer.

6. This amended declaration (the “Amended Declaration”) incorporates the entirety of the Declaration with the exception of the last sentence of Paragraph 34 of the Declaration “Additionally, BK requested and the Debtor agreed to provide a post-petition retainer of \$10,000.00 to BK on or before June 16, 2021.”

7. To be clear BK is no longer requesting a post-petition retainer from the Debtor.

8. BK requests that the Amended Proposed Form of Order attached hereto as Exhibit 1 be entered at the convenience of the Court.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: July 2, 2021

/s/ Thomas D. Bielli
Thomas D. Bielli, Esquire